

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

2005 SEP 15 P 5:20

AMERICAN REINSURANCE COMPANY,  
et al.,

Plaintiffs,

v.

AMERICAN INTERNATIONAL GROUP  
and TRENWICK AMERICA  
REINSURANCE CORPORATION,  
Defendants.

CIVIL ACTION NO: 05-11840-MLW

**DEFENDANT TRENWICK AMERICA REINSURANCE CORPORATION'S  
MOTION TO STAY PROCEEDINGS PENDING ARBITRATION**

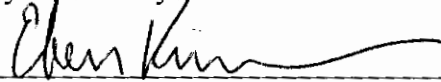
Defendant Trenwick America Reinsurance Corporation ("Trenwick"), for reasons set forth in the accompanying memorandum of law, respectfully moves this Court, pursuant to the provisions of Section 3 of the Federal Arbitration Act, 9 U.S.C. §3 (the "FAA"), for an Order: (i) determining that the only proper forum for the plaintiffs to assert their claims against Trenwick is arbitration, and (ii) staying this action pending the outcome of any arbitration that may be commenced involving Trenwick and the plaintiffs.

**REQUEST FOR HEARING**

Pursuant to Local District Court Rule 7.1(D), Trenwick requests that the Court schedule a hearing with respect to the instant motion as oral argument will be of assistance to the Court in resolving this matter.

**TRENWICK AMERICA  
REINSURANCE CORPORATION**

By its attorneys,



Mark W. Batten BBO #566211

Eben A. Krim BBO #652506

**PROSKAUER ROSE LLP**

One International Place, 22nd floor

Boston, MA 02210

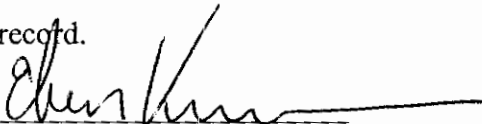
(617) 526-9700

Of Counsel:  
Ronald S. Rauchberg  
Margaret A. Dale  
David L. Shaul  
PROSKAUER ROSE LLP  
1585 Broadway  
New York, New York 10036  
(212) 969-3000

Dated: September 15, 2005

**CERTIFICATE OF SERVICE**

I, Eben A. Krim, counsel for Defendant Trenwick America Reinsurance Corporation, hereby certify that on September 15, 2005, I caused a copy of the foregoing document to be served by overnight delivery on all known counsel of record.



Eben A. Krim